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February 14, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: TeleWise, LLC
EB Docket No. 06-36; CY 2018

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the TeleWise, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Carey Roesel

Carey Roesel
Consultant

cc: Charles Power - TeleWise
tms: FCCx1901

Enclosures
CR/gs

EB Docket 06-36

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

USE OF CPNI

TeleWise, LLC (“TeleWise”) does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. TeleWise has trained its personnel not to use CPNI for marketing purposes. Should TeleWise elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

PROTECTION OF CPNI

TeleWise has put into place processes to safeguard its customers’ CPNI/call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

Although it has never occurred, TeleWise will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

DISCLOSURE OF CALL DETAIL OVER PHONE

Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

Company has put into place procedures to notify customers whenever an address of record is created or changed without revealing the changed information or sending the notification to the new account information.

DISCLOSURE OF CPNI ONLINE

Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information.

DISCLOSURE OF CPNI AT RETAIL LOCATIONS

TeleWise does not have any retail locations and therefore does not disclose CPNI in-store.

NOTIFICATION TO LAW ENFORCEMENT

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Although it has never occurred, TeleWise will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

ACTIONS AGAINST DATA BROKERS

Company has not taken any actions against data brokers in the last year.

CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

INFORMATION ABOUT PRETEXTERS

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI.